

## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Kenneth Grey, being duly sworn, state as follows:

### **Introduction and Agent Background**

1. I am a Border Patrol Agent (BPA), with the United States Border Patrol (USBP) which is part of the Department of Homeland Security (DHS). I have been with the USBP since 2009. To become a BPA, I completed the USBP Academy at the Federal Law Enforcement Training Center in Artesia, New Mexico. As part of this training, I attended criminal investigation training that included course studies in, among other things, criminal law, constitutional law, search and seizures, and courtroom procedure. My work as a BPA includes investigations related to unlawful aliens and alien smuggling. In the course of my duties, I have participated in interviews of defendants and witnesses relative to their illegal entry and alien smuggling. Through my observations and these interviews, I have gained a working knowledge and insight into the operational habits of unlawful aliens and alien smugglers, with particular emphasis on those who attempt to illegally enter, transport, harbor, or smuggle unlawful aliens into the United States from Mexico and Canada. I am currently assigned to the Swanton Border Patrol Station in Swanton, Vermont.

2. This affidavit is offered to demonstrate that probable cause exists to believe that Jumsy BELDOR (YOB: 1989) has knowingly or in reckless disregard of the fact that an alien has not received prior official authorization to come to, enter, or reside in the United States, brought to the United States in any manner whatsoever, such alien, regardless of any official action which may later be taken with respect to such alien, in violation of 8 U.S.C. § 1324(a)(2). Specifically, in the Highgate, Vermont area pictured below:



3. This affidavit is submitted for the limited purpose of securing a criminal complaint and therefore does not include everything I have learned during the course of my investigation. The facts in this affidavit come from my training and experience, my review of documents and reports, and conversations with other Border Patrol Agents. I am familiar with the facts and circumstances described below from my own investigation and from my discussions with other agents involved in the investigation. Unless otherwise specified, the statements described herein are related in sum and substance and are not intended as direct quotations.

### **Probable Cause**

4. On March 14th, 2025, at approximately 10:18 hours, Swanton Station Agents were notified by Swanton Sector Dispatch of one subject illegally crossing the United States and Canada Border near Derringer Road in the vicinity of Highgate, Vermont. The incursion was conveyed via remote camera activation and a photograph was taken of the subject.

5. At approximately 11:10 pm, Supervisory Border Patrol Agent (SBPA) Robert Rocheleau encountered Customs and Border Protection Officer (OFO), Ross Fruchtman, at the Highgate, Vermont Port of Entry during a vehicle inspection with a black 2019 Toyota RAV4, Ontario license plate #W86JXB. Jumsy BELDOR (YOB: 1989), a Haitian born, Canadian Citizen, was the sole occupant of the vehicle and in possession of documentation belonging to a male Haitian citizen, Kesny DOSSOUS (YOB: 1991).

6. At approximately 11:30 pm, OFO Fruchtman released BELDOR into the United States, and BELDOR was observed by SBPA Rocheleau as she proceeded to drive southbound on I-89 in Highgate, Vermont.

7. SBPA Rocheleau observed BELDOR's RAV4 take the first exit on I-89, approximately .25 miles from the port of entry, and stop near the Welcome Center Road. Shortly thereafter, SBPA Rocheleau observed the RAV4 turn the lights off and activate the hazard lights.

8. At approximately 11:35 pm, SBPA Rocheleau observed one subject exit the woods near the Welcome Center Road and enter the RAV4. The RAV4 then activated the lights and proceeded to re-enter I-89, southbound.

9. SBPA Rocheleau followed the RAV4 until he affected a vehicle stop with BPA Reilly Donahue at mile marker 125.6, approximately one mile south of the Highgate Port of Entry. During the vehicle stop SBPA Rocheleau identified two subjects, the driver of the vehicle

as Jumsy BELDOR and the passenger as Kensy DOSSOUS. DOSSOUS was seated in the rear seat. DOSSOUS matched the image description of the subject who illegally entered the United States earlier that evening. It was determined that DOSSOUS was a Haitian citizen illegally present in the United States. It was determined that DOSSOUS had not presented himself for inspection at the port of entry and was detained and transported to the Swanton Border Patrol Station.

10. BELDOR was also detained and transported to the Swanton Border Patrol Station.

11. DOSSOUS was *Mirandized* and interviewed with the assistance of a Haitian Creole interpreter. DOSSOUS stated that he believed he would not be allowed into the United States if he presented himself at the port of entry. DOSSOUS stated that he intended to circumvent the port of entry and have BELDOR pick him up once he crossed into the United States.

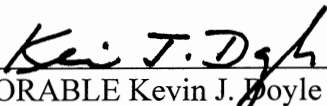
#### **Conclusion and Request**

12. Based on the foregoing information, I submit there is probable cause to believe that on March 14, 2025, in the District of Vermont, Jumsy BELDOR, knowingly or in reckless disregard of the fact that an alien had not received prior official authorization to come to, enter, or reside in the United States, brought to the United States in any manner whatsoever, such alien, regardless of any official action which may later be taken with respect to such alien in violation of 8 U.S.C. § 1324(a)(2). I respectfully request the Court issue a criminal complaint charging her accordingly.

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Kenneth Grey  
Border Patrol Agent  
U.S. Border Patrol, Swanton Station

Subscribed and sworn via reliable electronic means under Federal Rule of Criminal Procedure 4.1(b)(2)(A), specifically, a video call on the 16<sup>th</sup> day of March, 2025.

  
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HONORABLE Kevin J. Doyle  
United States Magistrate Judge  
District of Vermont